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December 22, 2015

BY ECF

Hon. Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East, Rm. N208
Brooklyn, NY 11201

Re: Howrilka v. City of New York, et al.
15 CV1113 (KAM) (RER)

Dear Magistrate Judge Reyes:

Pursuant to the Court's November 9, 2015, Order, the parties submit this joint status report. By Order dated September 10, 2015, defendants were to respond to Ms. Howrilka's respective discovery demands by October 2nd. The Municipal Defendants have done so. Today, Ms. Urena responded to Ms. Howrilka's discovery demands.

Ms. Howrilka owes discovery responses to the Municipal Defendants' demands. With the Court's permission, she will provide them by no later than January 8, 2016.

Following the exchange of paper discovery, the parties will be in a position to begin depositions. In light of the above, the parties request a three month extension of the discovery deadline, until March 25, 2016. We note that this represents the parties' first request to extend the discovery deadline.

Thank you for your consideration of these matters.

Respectfully submitted,

/s

Scott A. Korenbaum

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cc: Defense Counsel (by ECF)